

1 **SO. CAL. EQUAL ACCESS GROUP**

2 Jason J. Kim (SBN 190246)

3 Jason Yoon (SBN 306137)

4 101 S. Western Ave., Second Floor

5 Los Angeles, CA 90004

6 Telephone: (213) 205-6560

7 cm@SoCalEAG.com

8 Attorneys for Plaintiff

9 JESUS GARCIA

10 JESUS GARCIA,

11 Plaintiff,

12 vs.

13 TAX GUY ALBERT, INC.;  
14 HELIODOROS RAMOS; and DOES 1 to  
15 10,

16 Defendants.

17 **Case No.: 2:25-cv-01256-DSF (ASx)**

18 **NOTICE OF VOLUNTARY  
DISMISSAL OF ENTIRE ACTION  
WITH PREJUDICE**

19 **PLEASE TAKE NOTICE** that Plaintiff JESUS GARCIA (“Plaintiff”) pursuant to  
20 Federal Rule of Civil Procedure Rule 41(a)(1) hereby voluntarily dismisses the entire  
21 action *with* prejudice pursuant to Federal Rule of Civil Procedure Rule 41(a)(1) which  
22 provides in relevant part:

23 **(a) Voluntary Dismissal.**

- 24 (1) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and 66  
25 and any applicable federal statute, the plaintiff may dismiss an action  
26 without a court order by filing:  
27 (i) A notice of dismissal before the opposing party serves either an  
28 answer or a motion for summary judgment.

1 None of the Defendants has either answered Plaintiff's Complaint, or filed a motion for  
2 summary judgment. Accordingly, this matter may be dismissed without an Order of the  
3 Court.

4  
5 DATED: June 23, 2025

**SO. CAL. EQUAL ACCESS GROUP**

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8 By: /s/ Jason J. Kim  
9 Jason J. Kim, Esq.  
10 Attorneys for Plaintiff  
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